UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TOGETHER EMPLOYEES, by Individual Representatives, ROBERTA LANCIONE, JOYCE MILLER, MARIA DIFRONZO, MICHAEL SACCOCCIO, ELIZABETH BIGGER, NATASHA DICICCO, NICHOLAS ARNO and RUBEN ALMEIDA, Plaintiffs, v. MASS GENERAL BRIGHAM, INCORPORATED, Defendant.	Civil Action No. 1:21-cv-11686

MOTION FOR PROTECTIVE ORDER

Defendant Mass General Brigham, Incorporated ("MGB"), by and through its undersigned attorneys, and pursuant to Federal Rule of Civil Procedure 26(c)(1), submits this motion for a protective order related to the identities of (i) certain non-party-witnesses who may have relevant information in this case; and (ii) certain MGB employees whose requests for exemption from the vaccine mandate MGB approved.

For the reasons detailed in the accompanying memorandum of points and authorities, this motion should be granted in its entirety.

Dated: December 6, 2021

Respectfully submitted,

MASS GENERAL BRIGHAM INCORPORATED

By Its Attorneys,

/s/ Lynn A. Kappelman

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I hereby certify pursuant to Local Rule 7.1(a)(2) that on December 3, 2021, I conferred in good faith with opposing counsel, Ryan McLane, by telephone in order to resolve or narrow the issues presented by this motion. Counsel for the parties were unable to narrow the issues presented in this motion.

/s/ Lynn A. Kappelman
Lynn A. Kappelman

CERTIFICATE OF SERVICE

I, Lynn A. Kappelman, certify that on December 6, 2021, I caused a true and accurate copy of the foregoing document to be filed and uploaded to the CM/ECF system.

/s/ Lynn A. Kappelman
Lynn A. Kappelman